

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
(Richmond Division)**

In re:

LECLAIRRYAN PLLC,

Debtor.

Lynn L. Tavenner, as Chapter 7 Trustee,

Plaintiff,

vs.

**ULX Partners, LLC, UnitedLex
Corporation, and ULX Manager, LLC**

Defendants.

Chapter 7

Case No. 19-34574 (KRH)

Adv. Proc. No. 20-03142-KRH

**DECLARATION OF ULX PARTNERS, LLC, UNITEDLEX CORPORATION,
AND ULX MANAGER, LLC IN SUPPORT OF MOTION TO SEAL**

I, Eric Paul Kelly, on behalf of ULX Partners, LLC, UnitedLex Corporation, and ULX Manager, LLC (collectively, the “ULX Entities”) hereby declare that the following is true to the best of my knowledge, information and belief:

1. I am Vice President and Corporate Counsel of UnitedLex Corporation (“UnitedLex”) and am authorized to make, and hereby submit, this declaration on behalf of the ULX Entities.

2. In my role as Vice President and Corporate Counsel, I am regularly informed of and handle matters relating to the reputation of the ULX Entities – particularly UnitedLex – in the marketplace. Indeed, protecting UnitedLex’s reputation is an important component of our business as we are involved in sales and partnering with companies (including law firms).

3. Throughout this litigation, various news outlets published stories about this matter – many with negative headlines and inferences about UnitedLex. By way of example, and without limitation, in July 2021, Virginia Business published an article entitled “UnitedLex still faces \$128M lawsuit from LeClairRyan trustee,” which noted allegations of unauthorized practice of law by UnitedLex and mismanagement by UnitedLex employees. Similarly, in November 2021, The American Lawyer published an article entitled “LeClairRyan Founder, UnitedLex Can’t Dodge Bankruptcy Trustee’s Claims”. More recently, various articles were written about the settlement of this adversary proceeding, including one in Richmond Bizsense on July 5, 2022, which alleged that UnitedLex “is now seen as having a hand in LeClairRyan’s undoing,” and that “Tavenner had alleged that ULX was a conspiracy to siphon millions out of the 30-year-old law firm as it was teetering toward collapse.” And on July 12, 2022, Law360 published an article entitled “US Trustee to Fight LeClairRyan Deal Over \$3M Quinn Payout” that referenced allegations that “UnitedLex, along with former LeClairRyan leaders, used a ‘back office’ joint venture known as ULX Partners to drain the struggling firm and prolong its demise.” These are only a few examples of the many articles written about this matter that I have seen.

4. During the course of the litigation, UnitedLex received numerous inquiries from UnitedLex clients, prospective clients, and current and prospective employees regarding the litigation. UnitedLex’s counsel also received numerous requests and inquiries from legal industry news outlets reporting on the litigation. As a significant portion of UnitedLex’s business is providing legal support services to law firms, and as UnitedLex continues efforts to grow its business and recruit professionals in the legal industry, such inquiries regarding allegations in the litigation are particularly sensitive and concerning for our business.

5. Without waiving any privilege or protection, [REDACTED]

[REDACTED]

[REDACTED] the final Omnibus

Settlement Agreement contained a provision stating that in settling the adversary proceeding, neither party was admitting any fault, wrongdoing, or liability.

6. When the Mediator's Proposal was presented to UnitedLex by the Judicial Mediator, the discussion [REDACTED]

[REDACTED]

7. Again, without waiving any privilege or protection, UnitedLex (and other parties and insurers) ultimately agreed to the \$21 million settlement. [REDACTED]

[REDACTED]

8. Only after the settlement was announced on the record, and during the long and tedious process of finalizing the language and mechanics of the Omnibus Settlement Agreement, and particularly once the Trustee filed her 9019 Motion on May 18, 2022, provided draft supporting declarations thereafter, and filed her final declarations on June 3, 2022, [REDACTED]

[REDACTED]

9. Presumably in light of prior discussions of settling this case [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

10. Based upon my experience in this case to date and the press coverage, [REDACTED]

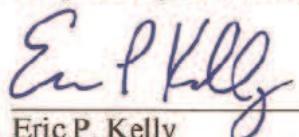
[REDACTED]

[REDACTED]

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 13, 2022

Respectfully submitted,



Eric P. Kelly
Vice President and Corporate Counsel
UnitedLex Corporation